

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 22-20104-CR-JEM(s)(s)(s)(s)

UNITED STATES OF AMERICA

vs.

ARCANGEL PRETEL ORTIZ *et al.*,

Defendants.

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DISCOVERY STATUS REPORT

On November 16, 2023, the Honorable Jacqueline Becerra, United States Magistrate Judge for the Southern District Florida, held a conference regarding the status of discovery in the above-captioned case. At that conference, the government advised that certain translations were pending production, as well as certain search warrant returns, which were undergoing a filter review. The Court ordered that the government provide a written update by December 15, 2023, advising of the status of those productions. Pursuant to that Order, the government writes to advise that on December 15, 2023, the government produced to the Coordinated Discovery Attorney translations and/or transcriptions of 144 files and the complete filter-cleared contents of four email search warrant returns.

The government notes that it is still awaiting returns for additional translations and transcriptions, and an index of those pending items will be made available to defense counsel. If additional transcriptions or translations are ordered in anticipation of trial, the government will so advise the defense in an effort to avoid unnecessary expenditures. The government also remains

available to confer with defense counsel regarding any transcriptions or translations they anticipate requesting to avoid any duplication of efforts.

As to the search warrant returns that were undergoing filter review, these relate to April 2023 search warrants issued to various providers regarding email addresses associated with defendants Ortiz, Intriago, Veintemilla, Sanon, Solages, and Bergmann. The providers returned responsive materials for six email addresses. A filter team has completed its review of four of those email addresses, which belonged to Intriago, Veintemilla, Sanon, and Solages, and the filter-cleared contents of those returns were produced to the defense, in full, on December 15, 2023. Pursuant to filter protocols, these returns were reviewed by a filter AUSA, who solicited the views of defense counsel regarding potentially privileged documents before providing a set of cleared materials to the prosecution team for processing, cataloging, and production in discovery. The prosecution is still awaiting filter-cleared materials for two email addresses, which belong to Mr. Ortiz and Mr. Bergmann. The same were not delivered by the relevant provider until August 2023.

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The government is working to produce the aforementioned materials as quickly as possible and proposes filing an update with the Court by January 15, 2023 regarding the status of those productions.

Respectfully submitted,

MARKENZY LAPOINTE
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 15, 2023, I electronically filed the foregoing document with the Clerk of the Court via CM/ECF.

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